

Servo Wealth Management LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Servo Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at (405) 384-5132 or by email at eric@servowealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Servo Wealth Management LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Servo Wealth Management LLC's CRD number is: 159367

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Registration does not imply a certain level of skill or training.

Version Date: 03/29/2021

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment on 03/24/2020 of Servo Wealth Management are described below. Material changes relate to Servo Wealth Management's policies, practices or conflicts of interests.

- Servo Wealth Management has updated fees and compensation to include selection of other advisors (Item 4, Item 5, Item 10, Item 14).

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Item 4: Advisory Business

A. Description of the Advisory Firm

Servo Wealth Management is a Limited Liability Company organized in the state of Oklahoma.

This firm has been in business since January 2012, and the sole owner is Eric D. Nelson.

B. Types of Advisory Services

Servo Wealth Management (hereinafter “SERVO”) offers the following services to advisory clients:

Investment Supervisory Services

SERVO offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. SERVO creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client’s specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

SERVO evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. SERVO will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Financial planning is included within the investment advisory services offered and is not a separate standalone service with separated fees.

Selection of Other Advisers

SERVO may direct clients to third-party investment advisers. Before selecting other advisers for clients, SERVO will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where SERVO is recommending the adviser to clients.

Services Limited to Specific Types of Investments

SERVO generally limits its investment advice and/or money management to mutual funds and ETFs. SERVO may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

SERVO will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by SERVO on behalf of the client. SERVO will not use "model portfolios" but rather a specific set of recommendations for each client. SERVO's portfolio allocations are based on each client's unique need, ability, and willingness to take risk, taking into account all of their non-managed assets as well as their human capital and additional sources of cash flow.

Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. SERVO DOES NOT participate in any wrap fee programs.

E. Amounts Under Management

SERVO has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 84,437,000.00	\$ 0.00	December 2020

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

Total Assets Under Management	Annual Fee*
All assets up to \$2,000,000	1.00%
\$2,000,001 to \$10,000,000	0.50%

Total Assets Under Management	Annual Fee*
All assets above \$10,000,000	0.25%

These fees are negotiable, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in advance, and clients may terminate their contracts with seven days' written notice. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. Fees that are collected in advance will be refunded based on the prorated amount of work completed up to the day of termination within the quarter terminated. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the quarter up to and including the day of termination. (*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter). Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. Clients who maintained an investment advisory relationship with Eric Daniel Nelson prior to him establishing SERVO may receive a discounted fee.

Advisory fees are withdrawn directly from the client's accounts with client written authorization. In cases where Adviser fees are directly deducted, Adviser is required to a.) Obtain client authorization, b.) Send a copy of the invoice to the client at the same time that the IA directs invoice to the custodian for payment, c.) Disclose that the custodian will send quarterly invoices to the client wherein Advisor fees are itemized.

Selection of Other Advisers Fees

SERVO may direct clients to third-party investment advisers. SERVO will be compensated via a fee share from the advisers to which it directs those clients. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

SERVO may specifically direct clients to Betterment. The annual fee schedule is as follows:

Total Assets	SERVO's Fee	Betterment's Fee	Total Fee
\$0 - \$1,000,000	0.75%	0.25%	1.00%
\$1,000,001 - \$2,000,000	0.50%	0.25%	0.75%
\$2,000,001 - \$10,000,000	0.25%	0.25%	0.50%
\$10,000,001 and Up	0.10%	0.25%	0.35%

SERVO will also charge a one-time fee of \$250 to \$500 for the set up of the accounts, transfer in assets, and establishment of the asset allocation based on client goals, return needs, and risk tolerance.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in advance. Advisory fees may also be invoiced and billed directly to the client quarterly in advance. Clients may select the method in which they are billed.

Payment of Selection of Other Advisers Fees

Fees are paid quarterly in advance.

Fees for selection of Betterment as third-party adviser are withdrawn by Betterment directly from client accounts. SERVO then receives its portion of the fees from Betterment; SERVO does not directly deduct the advisory fees.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by SERVO. Transaction fees greater than this amount charged by the custodian are rebated back to the client on a quarterly basis. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

SERVO collects fees in advance. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the client via check. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the quarter up to and including the day of termination. (*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter).

E. Outside Compensation For the Sale of Securities to Clients

Neither SERVO nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

Item 6: Performance-Based Fees and Side-By-Side Management

SERVO does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

SERVO generally provides investment advice and/or management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

Minimum Account Size

There is an account minimum, \$1,000,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

SERVO considers a portfolio's exposure to stocks, bonds, and cash as the primary determinate of risk and return, followed by the exposures to well-documented dimensions of expected return – size, value, and profitability within the stock market, and term, default, and currency in the bond market.

Investment Strategies

SERVO uses asset allocation, broad diversification, targets exposure to well-documented sources of expected return, emphasizes low-cost and tax efficient implementation, and employs disciplined rebalancing as our primary investment approaches.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

SERVO utilizes multi-factor regressions to determine a security or portfolio's asset allocation and exposure to various dimensions of expected return as well as any additional returns ("alpha") not attributed to asset allocation or the dimensions of expected return.

Investment Strategies

Asset allocation generally considers a portfolio's mix of assets, broadly defined by the breakdown between stocks, bonds, and cash. Multi-factor investor further considers a portfolio's orientation and exposure to well-documented sources of expected return, specifically size, value, and profitability in stocks, as well as term, default, and currency in bonds.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

SERVO generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. Because of SERVO's broad diversification across thousands of securities in the global equity and fixed income markets, SERVO will only take risks that carry an expected return, while seeking to diversify away all non-systematic risks that do not carry a commensurate reward.

Mutual Funds: Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned above).

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

Stocks & Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

Real Estate funds face several kinds of risk that are inherent in this sector of the market. Liquidity risk, market risk and interest rate risk are just some of the factors that can influence the gain or loss that is passed on to the investor. Liquidity and market risk tend

to have a greater effect on funds that are more growth-oriented, as the sale of appreciated properties depends upon market demand. Conversely, interest rate risk impacts the amount of dividend income that is paid by income-oriented funds.

REITs have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

Asset Class Investing is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither SERVO nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither SERVO nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither SERVO nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

SERVO may direct clients to third-party investment advisers. SERVO will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that SERVO has an incentive to direct clients to the third-party investment advisers that provide SERVO with a larger fee split. SERVO will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. SERVO will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where SERVO is recommending the adviser to clients.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

SERVO does not recommend that clients buy or sell any security in which a related person to SERVO or SERVO has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of SERVVO may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of SERVVO to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SERVVO will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of SERVVO may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of SERVVO to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SERVVO will always transact client's transactions before its own when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

The Custodian will be chosen based on their relatively low transaction fees and access to mutual funds and ETFs. SERVVO will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

SERVVO recommends Charles Schwab & Co., Inc. Advisor Services.

1. Research and Other Soft-Dollar Benefits

SERVVO does not receive products or services other than execution ("soft dollar benefits") from a broker-dealer or third-party for generating commissions, but does receive additional economic benefits described in Item 14.

2. Brokerage for Client Referrals

SERVVO and its related persons receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

SERVVO and its related persons will not allow clients to direct SERVVO to use a specific broker-dealer to execute transactions. Clients must use SERVVO recommended custodian (broker-dealer).

B. Aggregating (Block) Trading for Multiple Client Accounts

SERVO maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing SERVO the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least monthly by Eric Daniel Nelson. He reviews clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at SERVO are assigned to Eric Daniel Nelson.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Eric Daniel Nelson. There is only one level of review and that is the total review conducted to create the financial plan.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive monthly from the custodian a written report that details the client's account including assets held and asset value which will come from the custodian. Client will also receive quarterly performance report from SERVO that lists net of fee performance, portfolio inflows, outflows, comparisons to relevant benchmarks, and current allocations relative to IPS target allocations.

Clients are provided a one-time financial plan concerning their financial situation as part of the investment advisory services. After the presentation of the plan, there are no further reports unless client circumstances change and plans must be amended.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

SERVO receives compensation from third-party advisers to which it directs clients.

Charles Schwab & Co., Inc. Advisor Services provides SERVO with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For SERVO client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to SERVO other products and services that benefit SERVO but may not benefit its clients' accounts. These benefits may include national, regional or SERVO specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of SERVO by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist SERVO in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of SERVO's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of SERVO's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to SERVO other services intended to help SERVO manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to SERVO by independent third parties. Charles Schwab & Co.,

Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to SERVO. SERVO is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

B. Compensation to Non – Advisory Personnel for Client Referrals

SERVO does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

SERVO, with client written authority, has limited custody of client's assets through direct fee deduction of SERVO's Fees only. If the client chooses to be billed directly by the Custodian, SERVO would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

For those client accounts where SERVO provides ongoing supervision, the client has given SERVO written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides SERVO discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

SERVO will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

SERVO does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither SERVO nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

SERVO has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

The education and business background of Eric Daniel Nelson can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Eric Daniel Nelson's other business activities can be found on the Supplemental ADV Part 2B forms.

C. How Performance Based Fees are Calculated and Degree of Risk to Clients

SERVO does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

No management person at SERVO or SERVO has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Neither SERVO, nor its management persons, has any relationship or arrangement with issuers of securities.